

Exhibit A

IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ALABAMA WESTERN DIVISION

KIMBERLY and JOHN STAPLES,	§	
	§	
Plaintiffs,	§	
	§	
V.	§	Case No. 7:18-cv-00160-LSC
	§	
H. WALKER ENTERPRISES, LLC,	§	
RENAISSANCE MAN FOOD	§	
SERVICES, LLC, and	§	
SIMMONS,	§	
	§	
Defendants.	§	

DECLARATION OF TALLEY R. PARKER IN SUPPORT OF DEFENDANT SIMMONS PREPARED FOODS, INC.'S OPPOSITION TO PLAINTIFF JOHN STAPLES' MOTION FOR SUMMARY JUDGMENT AS TO LIABILITY

- 1. My name is Talley R. Parker. I am over 21 years of age and am fully competent to make this declaration. I have personal knowledge of all facts recited herein and state that such facts are true and correct.
- 2. I am an attorney with the law firm of Jackson Lewis P.C., 500 N. Akard, Suite 2500, Dallas, Texas 75201, and I represent Defendant Simmons Prepared Foods, Inc. ("Simmons") in the above-referenced action. I respectfully submit this declaration in support of Simmons' Opposition to Plaintiff John Staples' ("Mr. Staples") Motion for Summary Judgment as to Liability ("Motion").

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- 3. Attached as Exhibit 1 to Simmons' Opposition to Mr. Staples' Motion is a true and correct copy of the oral deposition of David Jackson.
- 4. Attached as Exhibit 2 to Simmons' Opposition to Mr. Staples' Motion is a true and correct copy of the oral deposition of Mr. Staples.
- 5. Attached as Exhibit 3 to Simmons' Opposition to Mr. Staples' Motion is a true and correct copy of Mr. Staples' March 6, 2009 offer letter.
- 6. Attached as Exhibit 4 to Simmons' Opposition to Mr. Staples' Motion is a true and correct copy of the April 2009 Resolution authorizing Mr. Staples to act as the General Manager of Walker Foods on an "at-will basis."
- 7. Attached as Exhibit 5 to Simmons' Opposition to Mr. Staples' Motion is a true and correct copy of Simmons' Disciplinary Actions policy.
- 8. Attached as Exhibit 6 to Simmons' Opposition to Mr. Staples' Motion is a true and correct copy of the oral deposition of Herschel Walker.
- 9. Attached as Exhibit 7 to Simmons' Opposition to Mr. Staples' Motion is a true and correct copy of an October 25, 2017 email from David Jackson to Herschel Walker and Ron Eisenman.
- 10. Attached as Exhibit 8 to Simmons' Opposition to Mr. Staples' Motion is a true and correct copy of the transcript of Mr. Staples' termination meeting.

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11. Attached as Exhibit 9 to Simmons' Opposition to Mr. Staples' Motion is a duly executed declaration signed by Todd Simmons, Chief Executive Officer of Simmons Foods, Inc.

12. Attached as Exhibit 10 to Simmons' Opposition to Mr. Staples' Motion is a duly executed declaration signed by Donald (Chip) L. Miller Jr., a Senior Vice President of Sales for Simmons

13. Attached as Exhibit 11 to Simmons' Opposition to Mr. Staples' Motion is a duly executed declaration signed by David Jackson, Simmons' President and Chief Operating Officer.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 4, 2019.

Talley R. Parker